



## Regulatory Back Office, Inc.

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### Redacted For Public Inspection

1/16/2009

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Subject: **Teleplus, LLC** - Quarterly PIU Report for **1st Quarter 2009** (revenues generated in 4th Quarter 2008), WC Docket No. 05-68

Dear Secretary Dortch,

**Teleplus, LLC** pursuant to Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457, 0.459 (1994), hereby provides the following redacted version (made available for public inspection) of the Certification marked and filed as "Confidential" with the Commission pursuant to the applicable rules.

**Teleplus, LLC** requests that the confidential version of this Certification sent to the Commission prior, be treated as a confidential document not subject to public inspection. This Certification contains information regarding **Teleplus, LLC's** calling card traffic patterns and revenue – information that would not otherwise be available to the public.

Due to the confidential nature of such data, **Teleplus, LLC** hereby requests that the confidential version of this Certification sent to the Commission prior, be treated as a confidential document not subject to public inspection. Accordingly, the confidential version of this Certification sent to the Commission prior of Teleplus, LLC has been marked "Confidential – Not For Public Inspection" and as such, was submitted prior to the commission via a separate submission. To differentiate this redacted version of the Confidential Certification from the actual Confidential version of the Certification, this redacted version is marked "Redacted For Public Inspection". **Teleplus, LLC** provides justification for the confidential treatment of this data in Attachment 1 to this letter. **Teleplus, LLC** is also submitting, under separate cover, for inclusion in the Commission's public files, a redacted version of this Certification. The redacted version marked "Redacted – For Public Inspection." With the confidential data redacted.

If you have any questions or comments about this filing, please free to call me at (305)-477-7580 or send an email to [telecomfederal@regbackoffice.com](mailto:telecomfederal@regbackoffice.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Alonzo Beyene", is written over a horizontal line.

Alonzo Beyene  
Regulatory Consultant

CC: Chief, Pricing Policy Division, Wireline Competition Bureau Federal  
Communications Commission  
Best Copy and Printing, Inc. ([fcc@bciweb.com](mailto:fcc@bciweb.com))

#### Attachment 1

**Teleplus, LLC** requests confidential treatment of the information being provided in its Pre-Paid Calling Card Provider FCC Quarterly Certification ("Certification") because this information is competitively sensitive and its disclosure would have a negative competitive impact on **Teleplus, LLC** were it made publicly available. Such data would not ordinarily be made available to the public, and should be afforded confidential treatment under 47 C.F.R. §§0.457 and 0.459.

#### 47 C.F.R. §§0.457

Specific information in the Certification is confidential and proprietary to **Teleplus, LLC** as "trade secrets and commercial or financial information" under Section 47 C.F.R. § 0.457(d). Disclosure of such data to the public would risk revealing company-sensitive proprietary data in connection with Teleplus, LLC with ongoing business and operations.

#### 47 C.F.R. §§0.459

Specific data in the Certification is also subject to protection under 47 C.F.R. §0.459, as demonstrated below.

#### Information for which confidential treatment is sought

**Teleplus, LLC** requests that specific data in the Certification, marked as "[Redacted]" be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The data designated as confidential is information regarding **Teleplus, LLC** percentage of intrastate, interstate and international calling card minutes. This data is competitively sensitive data that **Teleplus, LLC** maintains as confidential and is not normally made available to the public. Release of the data would have a substantial negative impact on **Teleplus, LLC** since it would provide competitors with commercially sensitive data. The non-redacted version of **Teleplus, LLC**'s filing is marked as "Confidential – Not For Public Inspection."

Commission proceeding information is submitted as **Teleplus, LLC**'s Prepaid Calling Provider FCC Quarterly Certification in WC Docket No. 05-68.

#### Degree to which the data in question is commercial or financial, or contains a trade secret or is privileged

The information designated as confidential is information regarding **Teleplus, LLC**'s percentage of intrastate, interstate and international calling card minutes. As noted above, the data is competitively sensitive data, which is not normally released to the public as such release would have a substantial negative competitive impact on **Teleplus, LLC**.

Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm

The release of this confidential and proprietary information would cause **Teleplus, LLC** competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of **Teleplus, LLC**'s business.

Measures taken by **Teleplus, LLC** to prevent unauthorized disclosure: and availability of the information to the public and extent of any previous disclosures of the information to third parties.

**Teleplus, LLC** has treated and continues to treat the non-public information disclosed in this Certification as confidential and has protected it from disclosure to parties outside of the company.

Justification of the period during which **Teleplus, LLC** asserts that the materials should not be available for public disclosure

**Teleplus, LLC** cannot determine at this time any data on which this information should not be considered confidential.

Other information **Teleplus, LLC** believes may be useful in assessing whether its requests for confidential

Under applicable Commission decisions, the information in question should be withheld from public disclosure.


**Teleplus, LLC**  
5520 Cherokee Avenue, Suite 210  
Alexandria, VA 22312

**Redacted For Public Inspection**

**Certification of Teleplus, LLC**

1. Pursuant to 47 C.F.R. § 64.5001 (c), the undersigned hereby certifies that they are an officer of **Teleplus, LLC**; and that to the best of my knowledge, data or belief, all statements of fact contained in this certification are true and that said certification is an accurate statement of the data set forth herein for the reporting period of **1st Quarter 2009** (revenues generated in 4th Quarter 2008).
2. The following is the percentage of intrastate, interstate, and international calling card minutes for the above stated reporting period.
  - a. Percentage of intrastate calling card minutes: [Redacted]
  - b. Percentage of interstate calling card minutes: [Redacted]
  - c. Percentage of international calling card minutes: [Redacted]
3. The percentage of total prepaid calling card service revenue (excluding revenue from prepaid calling cards sold by, to, or pursuant to contract with Department of Defense (DoD) or a DoD entity) attributable to interstate and international calls for the reporting period [Redacted] and [Redacted]
4. **Teleplus, LLC** currently has a *De minimis* status with USAC and as such, does not directly contribute into the Universal Service Fund based on the reported data, in line with the applicable Commission regulations.
5. **Teleplus, LLC** has complied with the reporting requirements described in paragraph (a) of 47 C.F.R. § 64.5001, by providing the required reports to carriers from which transport Services are purchased [OR: **Teleplus, LLC** has provided the reports required under paragraph (a) of 47 C.F.R. § 64.5001 to carriers from which transport services are purchased.]

The foregoing certification is made under penalty of perjury of the law of the State / Commonwealth of **Virginia** on this, the **16th** day of **January**, 2009.

Signature: 

Printed Name: **Amr Ibrahim**

Position: **LLC Manager**